

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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In re :
JOSE & LUZ PEREZ : Chapter 13
Debtors. : Bankruptcy No. 20-10974
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**STIPULATION RESOLVING DEBTORS' INFORMAL OBJECTION TO THE
CITY OF PHILADELPHIA'S PROOF OF CLAIM #8-1**

Jose and Luz Perez (the "Debtors") and the City of Philadelphia (the "City") in order to resolve the Debtors' objection to the City's Proof of Claim #8-1 in the above-captioned case hereby enter into this Stipulation Resolving Debtor's Informal Objection to the City of Philadelphia's Proof of Claim #8-1 (the "Stipulation").

WHEREAS, the Debtors commenced the above-captioned bankruptcy case on February 18, 2020.

WHEREAS, on August 12, 2020, the City filed a proof of claim in the amount of \$19,261.43 owed by the Debtor to the City of which \$16,583 is a secured claim for judgments and \$483.11 is a priority tax claim. (the "Claim").

WHEREAS, prior to the bankruptcy filing, the City obtained three code enforcement judgments ("CE Judgments") against the Debtor which are described as follows:

| Docket Number | Date | Amount |
|------------------|-----------|--------|
| CE-11-12-73-0202 | 1/25/2012 | \$5100 |
| CE-11-12-73-0943 | 2/9/2012 | \$5100 |

| | | |
|------------------|----------|----------|
| CE-17-09-73-0304 | 1/3/2018 | \$5,027 |
| Total | | \$15,227 |

WHEREAS, the Debtors having asserted an informal objection to the Claim. (“Objection”).

NOW, THEREFORE, in consideration of the background set forth above and the terms and conditions of this Stipulation as more fully set forth below, the Debtors and the City (collectively referred to as the “Parties”) agree to be bound and do hereby stipulate as follows:

1. The Parties wish to amicably resolve the Objection.
2. The portion of the Claim that relates to CE Judgments shall be adjusted to an allowed secured claim in the amounts described below:

| Docket Number | Reduced Payment Amount |
|------------------|------------------------|
| CE-11-12-73-0202 | \$600 |
| CE-11-12-73-0943 | \$600 |
| CE-17-09-73-0304 | \$527 |
| Total | \$1,727 |

3. The rest of the City’s proof of claim remains an allowed claim.
4. The City’s priority tax was eliminated as a result of the Debtor Jose Perez’s recently filed business tax returns. The City’s general unsecured claim was reduced to \$103.98 as a result of Debtor, Luz M. Perez’s recently filed business tax returns.

5. Within twenty (20) days of this Stipulation receiving approval by this Honorable Court, the City shall amend its Claim to reflect the adjustments reflected above in paragraphs 2 & 4.

6. Within twenty (20) days of the City amending its Claim, the Debtors shall amend their Plan to provide for full payment of the Claim together with post-petition interest on the reduced judgment portion of the Claim.

7. The terms of this Stipulation shall not be binding upon the City should this case be dismissed or converted to one under Chapter 7.

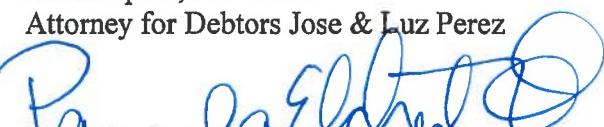
Respectfully submitted,

Date: 10/20/20



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Attorney for Debtors Jose & Luz Perez

Date: 10/22/20



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Attorney for the City of Philadelphia

AND NOW, this ____ day of _____, 2020, upon consideration of the Stipulation between Jose & Luz Perez and the City of Philadelphia, it is hereby ORDERED that the Stipulation is approved.

ERIC L. FRANK
UNITED STATES BANKRUPTCY JUDGE